

1 C. D. Michel – SBN 144258
2 cmichel@michellawyers.com
3 Sean A. Brady – SBN 262007
4 sbrady@michellawyers.com
5 Konstadinos T. Moros – SBN 306610
6 kmoros@michellawyers.com
7 MICHEL & ASSOCIATES, P.C.
8 180 E. Ocean Blvd., Suite 200
9 Long Beach, CA 90802
10 Telephone: (562) 216-4444
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986
13 Law Offices of Donald Kilmer, APC
14 14085 Silver Ridge Road
15 Caldwell, Idaho 83607
16 Telephone: (408) 264-8489
17 Email: Don@DKLawOffice.com

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;
23 ANTHONY MIRANDA, an individual;
24 ERIC HANS, an individual; GARY
25 BRENNAN, an individual; OSCAR A.
26 BARRETTO, JR., an individual;
27 ISABELLE R. BARRETTO, an
28 individual; BARRY BAHRAMI, an
individual; PETE STEPHENSON, an
individual; ANDREW HARMS, an
individual; JOSE FLORES, an
individual; DR. SHELDON HOUGH,
DDS, an individual; SECOND
AMENDMENT FOUNDATION; GUN
OWNERS OF AMERICA; GUN
OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.;
THE LIBERAL GUN CLUB, INC.; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official
capacity as Attorney General of the
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF ERIC HANS IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

42 U.S.C. §§ 1983 & 1988

Hearing Date: December 4, 2023
Hearing Time: 1:30 p.m.
Courtroom: 9 B
Judge: Hon. Cormac J. Carney

DECLARATION OF ERIC HANS

1
2 1. I, Eric Hans, am a plaintiff in the above-entitled action. I make this
3 declaration of my own personal knowledge and, if called as a witness, I could and
4 would testify competently to the truth of the matters set forth herein.

5 2. I am a current resident of Riverside County, California.

6 3. I am a law-abiding adult who is not prohibited from owning firearms under
7 the laws of the United States of America or the state of California. I have never
8 been found by any law enforcement agency, any court, or any other government
9 agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a
10 member of the California Rifle & Pistol Association, another plaintiff in this matter.

11 4. I have a valid and current California concealed carry weapon ("CCW")
12 permit issued by the Riverside County Sheriff's Department. Because I frequently
13 travel out of state for my work, I also have a CCW permit issued by the State of
14 Arizona, which is valid in that state as well as in Nevada.

15 5. I legally carry a concealed firearm with me on a daily basis, so that I may be
16 armed and be able to defend myself and potentially others in the event of a life-
17 threatening emergency situation. Prior to SB 2, I only didn't carry my pistol when
18 planning on going to one of the few places where carry was not permitted, such as a
19 school or courthouse, or when I intended to have a drink with dinner.

20 6. Because SB 2 would prohibit me from carrying in many places where I am
21 accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus
22 my right to be armed for self-defense in public, will be outright eliminated in nearly
23 all common contexts.

24 7. For example, under SB 2 I cannot carry in any establishment where alcohol is
25 served, even if I do not intend to drink. That means I cannot conceal carry at most
26 of the restaurants that I patronize on a regular basis, nor can I even carry in the
27 parking area of such establishments. Under SB 2, I also cannot carry at the local
28 mall that I often visit for shopping because it has restaurants that serve alcohol,

1 making the mall and its parking lot out of bounds.

2 8. Those two provisions of SB 2 are hardly the only two that will impact me. I
3 can't carry while I stop at a gas station to fill up my car, because most gas stations
4 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is
5 also prohibited at urgent care facilities which I have utilized in the past for medical
6 attention and would use in the future. Carry is also prohibited at financial
7 institutions such as my local bank that I frequent, and a variety of other places that I
8 regularly visit.

9 9. SB 2 has a particular impact on me because the nature of my work involves
10 constant travel around Southern California. I drive to unfamiliar areas I have never
11 been to before, and would have no way of knowing if a particular area is off limits
12 under SB 2 for a reason that is not obvious (e.g. perhaps an athletic facility or a
13 restaurant that serves alcohol is tucked away in the other end of a strip mall I
14 parked in making the parking lot a prohibited place, and I don't know that). Besides
15 my local bank, my work also involves me depositing large sums of money at banks
16 throughout the state, and when I do so, I'd like to be able to defend myself in case
17 someone tries to harm me to steal that money. SB 2 takes the effective means of
18 self-defense away from me.

19 10. Even when I am in my own neighborhood SB 2 harms me. I live directly
20 across the street from a city park, and I frequently go for walks in that very park
21 while carrying, and I want to continue to be able to do so. I also carry at church
22 every Sunday. These places will now be off limits to me if I want to exercise my
23 constitutional right to carry.

24 11. These are, of course, just a few examples of how SB 2 affects me, and as I
25 go about my daily life, I am sure to discover several more. SB 2 has essentially
26 destroyed my constitutional right to carry, as so few of the places I go to on a daily
27 basis will permit carry, and I don't want to expose my firearm to theft by constantly
28 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would

1 continue to carry in all of these places as I did before the law took effect.

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed on September 28, 2023.

4 
5 Eric Hans, declarant

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

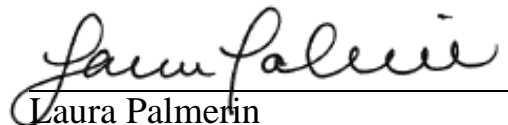
**DECLARATION OF ERIC HANS IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General
California Department of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Email: Robert.Meyerhoff@doj.ca.gov
Attorney for Defendant

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.



Laura Palmerin